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Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 09-42395 RLE

**TIMOTHY DANIEL HOULIHAN and
BARBARA RENE HOULIHAN,**

Chapter 13

Debtors.

**MOTION TO MODIFY CHAPTER 13 PLAN;
NOTICE TO CREDITORS OF
DEADLINE TO REQUEST A HEARING**

The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Debtors shall surrender the real property located at 2625 Coffee Tree Way, Antioch, CA 94509 to BAC Home Loans Servicing, LP. fka Countrywide.

The modification is sought on the following grounds:
Debtors will be moving out of state.

NOTICE IS HEREBY GIVEN:

(i) That Local Rule 9014-1 of the United States Bankruptcy Court for the Northern District of California prescribes the procedures to be followed and that any objection to the requested relief, or a request for hearing on the matter must be filed and served upon the undersigned

1 within twenty one (21) days of mailing of this notice;

2 (ii) That a request for hearing or objection must be accompanied
3 by any declarations or memoranda of law the party objecting or requesting
4 wishes to present in support of its position;

5 (iii) That if there is not a timely objection to the requested
6 relief or a request for hearing, the Court may enter an order granting
7 the relief by default; and

8 (iv) That the undersigned will give at least seven (7) days written
9 notice of hearing to the objecting or requesting party, and to any
10 trustee or committee appointed in the case, in the event an objection or
11 request for hearing is timely made.

12 Dated: October 14, 2010

13 /s/ Corrine Bielejeski
14 CORRINE BIELEJESKI
15 Attorney for Debtors
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